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September 6, 2005

Ms. Katrina Senger
Federal Election Commission
999 E Street, NW
Washington, DC 20463

ID # C00138560
Ref. Mid-Year Report (1/1/05-6/30/05)

Dear Ms. Senger:

This is in response to your letter of August 26 citing "limited payments for administrative expenses". As we have indicated on numerous occasions to similar FEC inquiries, we believe in this instance that \$17,364 in operating expenditures on receipts of \$114,311 and disbursements of 105,864 constitute adequate payments for "administrative expenses".

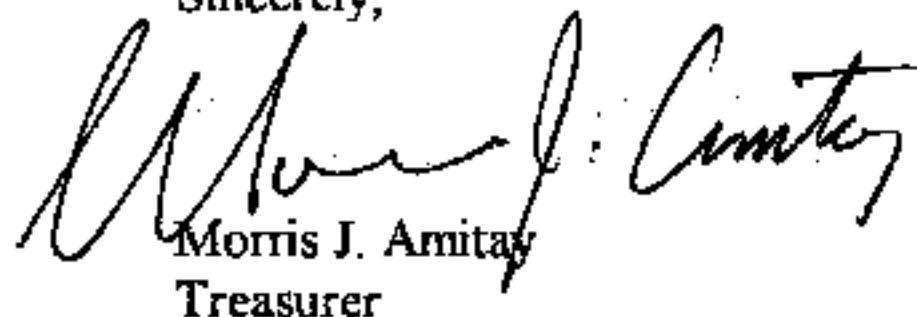
Aside from our itemization of costs incurred for printing, postage, catering, computer and conference room rentals, we note a \$2,000 monthly payment to the firm of Morris J. Amitay, P.C. to cover any other possible costs connected to administration of the PAC - e.g. record keeping, solicitation letters, and telephone use.

I am unaware of any FEC guidelines as to what minimal percentage of receipts is considered adequate and feel that the purpose of a PAC is to raise funds in order to contribute to candidates' campaigns, not to incur expensive overhead.

Please advise as to the adequacy of this response.

With best wishes,

Sincerely,


Morris J. Amitay
Treasurer

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